

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO
FOLLOW-UP INTERROGATORIES OF THE AMERICAN POSTAL WORKERS
UNION, AFL-CIO (APWU/USPS-T6-14 THROUGH 16 AND 20)**

The United States Postal Service hereby provides its response to the above-listed, follow-up interrogatories of the American Postal Workers Union (APWU), AFL-CIO, dated March 2, 2012. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-T6-14

- a) The final PIR for Detroit to Michigan Metroplex in the listing of HCR routes and the final PIR Mileage column for the final 15 lines rows contain mileage numbers not associated with the listed HCR. Please confirm that these numbers are wrong. If confirmed, please provide the correct mileage. If not confirmed, please explain.
- b) Please provide the correct mileage numbers for those routes, a corrected version of the PIR and the documentation for the number that was used in your calculations.
- c) Please confirm that the summary text of the Detroit to Michigan Metroplex AMP states “the approved Detroit AMP projected an annual transportation cost of \$846,407. The initiatives put in place nationwide and the overall consolidation of some routes in both Detroit and Michigan Metroplex show a PIR savings of \$13,299,655. This number is misleading however when you look at the figures that actually apply to the Detroit originating AMP. The losing site added 312,234.3 HCR miles and reduced 42,145.2 HCR miles as a result of the AMP for a net change of 270,089.1 additional HCR miles. Changes to PVS were unrelated to the AMP. The remaining changes were due to simultaneous initiatives to reduce transportation costs.”
- d) Please provide any corrected PIR.
- e) Please provide any corrected numbers in your worksheet.

RESPONSE:

- (a) I confirm that the mileage numbers identified in part (a) of this interrogatory (APWU/USPS-T6-14) are incorrect.
- (b) The correct mileage data for those routes are set forth in the chart below:

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RESPONSE TO APWU/USPS-T6-14 (CONT.):

Route #	Pre AMP Annual Mileage	Proposed Annual Mileage	Final PIR Annual Mileage
48119	243,757	243,757	250,593
60811	827,008	827,008	255,675
010KE	586,197	605,849	592,829
070L1	317,386	337,754	0
150Y0 (A)	766,355	897,228	757,340
150Y0 (B)	130,873	130,873	130,873
171L0	541,517	577,921	577,921
207FE	1,421,142	1,441,409	1,480,902
303SE	1,350,506	1,366,874	1,277,291
381Z0	506,666	506,666	506,666
607N0	1,466,406	1,466,406	1,459,321
640M1	458,640	478,292	480,472
680P0	460,818	480,470	480,685
751AE	758,939	778,601	778,627

The supporting documentation consists primarily of HCR Contract Activity Logs which contain data from the Transportation Contract Support System (TCSS) database. Supporting documentation is provided in Library Reference USPS-LR-N2012-1/97. A corrected version of the PIR is unavailable at this time.

- (c) Confirmed.
- (d) A corrected version of the PIR is unavailable at this time.
- (e) Please see the worksheet labeled "Attach.Resp.APWU.T6.14-16.20.xls" attached to this response.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-T6-15

- a) The final PIR for Wilkes-Barre to Scranton/Lehigh Valley PIR does not record any PVS miles in the PIR columns for either Scranton or Lehigh Valley. Please confirm that this results in an overestimation of the miles reduced by the AMP. If not confirmed, please explain.
- b) The original AMP states that there will be no change in the PVS service, please confirm that “no change” is the actual result or provide the corrected numbers.
- c) Please confirm that the calculations on the HCR contracts in the NP12 version of the PIR show only changes from proposed to actual rather than from prior to AMP to PIR because the prior to AMP column is redacted.
- d) Such redactions do not occur in the other PIRs in NP12. Is there a reason for the redaction in this particular PIR?
- e) Please confirm that if the comparison was made between the PIR levels and the pre-AMP levels that the result would be approximately a third the size of the number shown on your worksheet.
- f) Please provide any corrected PIR.
- g) Please provide any corrected numbers in your worksheet.

RESPONSE:

- (a) Confirmed.
- (b) Confirmed.
- (c) Confirmed.
- (d) A redacted version was provided in error.
- (e) Confirmed.
- (f) A corrected version of the PIR is unavailable at this time.
- (g) Please see the worksheet labeled “Attach.Resp.APWU.T6.14-16.20.xls” attached to this response.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN
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APWU/USPS-T6-16

- a) Please confirm that in the Charlottesville to Richmond PIR, that there is an error in the HCR calculations that causes you to overstate the reduction in miles by over 850,000 miles because the PIR time period numbers were not filled into the worksheet for Richmond (gaining) facility.
- b) Please confirm that the cost numbers in the PIR for the Richmond HCR contracts also do not appear to be correct and therefore the savings are overstated.
- c) Please provide any corrected PIR.
- d) Please provide any corrected numbers in your worksheet.

RESPONSE:

- (a) Confirmed.
- (b) Confirmed.
- (c) A corrected version of the PIR is unavailable at this time.
- (d) Please see the worksheet labeled "Attach.Resp.APWU.T6.14-16.20.xls" attached to this response.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-T6-20

- a) Please confirm that the worksheet that accompanied APWU/USPS-T6-1 (after the correction of all errors) contains ALL transportation changes noted between the pre-AMP and PIR time periods and not just those that resulted from the AMP.
- b) Since the PIRs seem to be able to distinguish between the transportation changes that are the result of the consolidation and the transportation changes that are the result of other changes to the transportation system, is it possible to distinguish between the two in your corrected response?
- c) Please confirm that transportation routes for a mail processing facility are scheduled to be re-evaluated on a regular basis and do not require a consolidation or an AMP study to make those changes.

RESPONSE:

- (a) Confirmed.
- (b) No.
- (c) Confirmed.